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Attorneys for Plaintiff JOESHANA CARD

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

JOESHANA CARD,
Plaintiff,
vs.
CAROLYN COLVIN, Acting
Commissioner of Social Security,
Defendant) Case No.: CV 15-5201 MEJ
) STIPULATION TO EXTEND
) BRIEFING SCHEDULE
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TO THE HONORABLE MARIA ELENA JAMES, MAGISTRATE JUDGE
OF THE DISTRICT COURT:

Plaintiff Joeshana Card (“Plaintiff”) and defendant Carolyn Colvin, Acting Commissioner of Social Security (“Defendant”), through their undersigned counsel of record, hereby stipulate, subject to the approval of the Court, to extend the time for Plaintiff to file Plaintiff’s Motion for Summary Judgment or Remand to July 1, 2016; and that Defendant shall have until August 1, 2016, to file her opposition, if any is forthcoming. Any reply by plaintiff will be due August 15, 2015.

1 Despite Counsel for plaintiff anticipating the prior request for an extension
2 to be his last, Counsel requires more time as a result of the impact of unanticipated
3 medical procedures to treat his spouses' terminal illness, including the unfortunate
4 news on June 2, 2016 of a second independent cancer diagnosis of multiple
5 myeloma in addition to the existing stage 4 breast cancer. Counsel for plaintiff
6 does not anticipate this extraordinary request for more time to become the rule and
7 recognizes it is the exception and sincerely apologizes to the court for any
8 inconvenience this may have had upon it or its staff.

Henry Chi
Special Assistant United States Attorney
Attorney for Defendant
[*Via email authorization]

1 IT IS HEREBY ORDERED that plaintiff may have an extension of time, to
2 and including July 1, 2016, in which to file Plaintiff's Motion for Summary
3 Judgment or Remand; Defendant may have an extension of time to August 1, 2016
4 to file her opposition, if any is forthcoming. Any reply by plaintiff will be due
5 August 15, 2016.

6 IT IS SO ORDERED.

7 DATE: June 28, 2016



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9 THE HONORABLE MARIA ELENA JAMES
10 UNITED STATES MAGISTRATE JUDGE
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